

Michael E. Glover
Senior Vice President & Deputy General Counsel



1515 North Court House Road
Suite 500
Arlington, VA 22201

Phone: 703.351-3860
Fax: 703-351-3676
michael.e.glover@verizon.com

July 19, 2004

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: CC Docket Nos. 01-338, 96-98, and 98-147

Dear Ms. Dortch:

The attached letter was provided to Chairman Powell today. Please place it on the record in the above proceeding.

Please let me know if you have any questions.

Sincerely,

/s/Michael E. Glover

Attachment

cc: Michael Powell
Christopher Libertelli
Jon Cody
Sheryl Wilkerson
Kathleen Abernathy
Matthew Brill
Michael Copps
Jordan Goldstein
Jessica Rosenworcel

Kevin Martin
Daniel Gonzalez
Samuel Feder
Jonathan Adelstein
Barry Ohlson
Scott Bergmann
Michelle Carey
Thomas Navin
William Maher
Jeffrey Carlisle
Bryan Tramont

Michael E. Glover
Senior Vice President & Deputy General Counsel



1515 North Court House Road
Suite 500
Arlington, VA 22201

Phone: 703.351-3860
Fax: 703-351-3676
michael.e.glover@verizon.com

July 19, 2004

Ex Parte

Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: CC Docket Nos. 01-338, 96-98, and 98-147

Dear Chairman Powell:

This letter responds to CompTel's July 9 letter arguing that the Commission should reinstate an unbundling requirement for high-capacity loops and transport as part of any interim or permanent rules the Commission may adopt.

CompTel's letter is long on rhetoric about the need for unbundling at TELRIC rates, but the facts show otherwise. The evidence before the Commission demonstrates that competing carriers are successfully providing competitive high-capacity services to business customers of all shapes and sizes *without* UNEs -- including the DS-1 loops and transport that are the focus of CompTel's letter.¹ As the record here shows, they are doing so both through the use of their own or other alternative facilities and through the use of special access services to further extend their reach.

First, demand for high capacity services is highly concentrated, and competing carriers have deployed alternative facilities wherever demand is concentrated. Indeed, 80 percent of the demand for Verizon's high-capacity special access services is concentrated in fewer than 8 percent of its wire centers. As the detailed maps in the record show, competing carriers can and have built their own high-capacity networks to target that demand. There are an average of 20 such networks in each of the top 50 MSAs, and competitors have deployed their own loop facilities to hundreds of buildings. Time Warner, for example, boasts that, depending on the area, it may have "more buildings connected" than the RBOCs. And as Verizon itself has found when it provides high-

¹ See Letter from Dee May, Verizon, to Marlene H. Dortch, CC Docket Nos. 01-338 *et al.*, (filed June 24, 2004) ("June 24 Ex Parte"); Letter from Michael E. Glover, Verizon, to Marlene H. Dortch, CC Docket Nos. 01-338 *et al.*, (filed July 2, 2004) ("July 2 Ex Parte").

capacity services in out-of-region markets, alternative providers can and do offer wholesale access to high-capacity loops and transport at all capacity levels.

Second, to the extent competing carriers do use facilities obtained from Verizon to provide high-capacity service to their own customers, they do so overwhelmingly by purchasing special access, not UNEs. Some of these carriers make no use of UNEs at all, such as Time Warner, which recently stated that it “does not rely upon UNEs” and instead purchases from “special access tariffs or under agreements with the ILECs” when it “need[s] services from ILECs to connect [its] remote customers to [its] vast fiber network.” Overall, 93 percent of the DS-1 loops that carriers obtain from Verizon, and 95 percent of the DS-1 loops that are purchased in combination with transport, are purchased as special access and not as UNEs or UNE EELs. Similarly, 98 percent of the DS-3 loops that carriers obtain from Verizon are purchased as special access. Competing carriers purchase these special access services at deep volume and term discounts, averaging 35-40 percent off of the list prices. As the maps in the record show, they then use these special access circuits to successfully provide high capacity service on an MSA-wide basis to customers of all shapes and sizes. These customers range from large enterprise customers to the small and medium-sized businesses — such as antique dealers, bookstores, dry cleaners, florists, gas stations, and travel agents — that purchase the DS-1 services that are the focus of CompTel’s latest filings.

CompTel’s letter completely ignores all of this and claims that reimposing unbundling requirements for high-capacity loops and transport is necessary to protect consumers. Its claims, however, cannot be squared with the facts.

As an initial matter, CompTel (at 2-3) suggests half-heartedly that the rule requiring unbundling of DS-1 loops was not vacated. In reality, the Court vacated the unbundling requirements for *all* high-capacity transport facilities, which it used as a generic term that it expressly defined to include any high-capacity “transmission facilities dedicated to a single customer or carrier” – a definition that includes both high-capacity loops and transport. *USTA II*, 359 F.3d 554, 573 (D.C. Cir. 2004). The Court *also* vacated all “portions of the order that delegate to state commissions the authority to determine whether CLECs are impaired without access to network elements.” *Id.* at 568. This, too, includes both high-capacity loops and transport. CompTel suggests that this latter holding does not apply to DS-1 loops because the Commission did not delegate the impairment determination for those loops, but that is factually wrong. The Commission *did* “delegate to the states the authority to . . . determine customer locations where competitive carriers are not impaired without access to incumbent LEC unbundled DS1s,” based on the “availability of wholesale competitive alternatives.” *Triennial Review Order*, 18 FCC Rcd 16978, ¶ 327 (2003). In addition, the Commission’s provisional impairment finding as to DS-1 loops, like its findings for high-capacity loops and transport generally, unlawfully ignored both “the availability of tariffed ILEC special access services” and “facilities deployment along similar routes” and was vacated for those reasons as well. *Id.* at ¶¶ 575, 577. Therefore, there is no valid unbundling

requirement for these facilities today, and any interim or permanent rules must take into account the current record before the Commission.

CompTel also asserts (at 3-4), based on a “study” by two former WorldCom executives, that the failure to reinstate unbundling requirements for DS-1 loops and DS-1 EELs will harm small business customers. But CompTel’s claims are based on the erroneous premise that CLECs rely primarily — if not exclusively — on *unbundled* DS-1 loops and transport rather than special access or alternative facilities. The facts, as noted above, demonstrate that to the extent CLECs use Verizon’s facilities to provide high-capacity services to their own end user customers, they do so overwhelmingly by purchasing special access, not UNEs. Moreover, CLECs’ extensive fiber-based networks allow other carriers to provide high capacity service at the DS-1 level over alternative loops and transport facilities wherever there is concentrated demand for those services.

In addition, CLECs are using DS-1 facilities purchased as special access services from incumbents to serve the small and medium-sized business customers that CompTel focuses on in its letter. Verizon previously submitted a list of the types of customers that CLECs (including CompTel’s members) are serving using special access services, and a copy of that list is attached. As this list makes clear, these customers include businesses of all shapes and sizes, including antique dealers, beauty salons and barber shops, bookstores, catering shops, dry cleaners, fabric stores, florists, landscaping services, and travel agents, just to name a few. Of course, these are all in addition to the customers that CLECs serve using their own or others alternative facilities.

Finally, even as to the small minority of DS-1 circuits that are purchased as UNEs, CompTel consciously inflates the supposed increase in wholesale rates that would occur if carriers purchasing those circuits were transitioned to special access rates. Indeed, despite conceding (at 4) that “[s]pecial access tariffed pricing is predicated on volume and term commitments,” CompTel’s “study” (at 4) completely fails to take into account the substantial discounts that go along with those commitments. But the facts show that CLECs do take advantage of the significant volume and term discounts, and then use those circuits to provide DS-1 level service to their own customers. At the time they purchase those services, CLECs make a straightforward make-or-buy decision as to whether it will be more beneficial for them to lease the circuits as special access, to obtain facilities from another provider, or to deploy their own. To the extent they conclude that they are better off leasing the circuits as special access, they are hardly justified in complaining that they may have to make volume or term commitments in exchange for the benefits of the discounted rates. And, in any event, the fact that CLECs are competing successfully to serve customers of all shapes and sizes using their own facilities or special access (and, by definition, must be offering them competitive rates) shows that they do not need the added artificial price reduction that comes with UNE pricing to do so.

For all of these reasons, CompTel’s calculation of supposed harm to small and medium-sized business customers is meaningless and does not support reinstating an

Honorable Michael K. Powell

July 19, 2004

Page 4 of 4

unbundling requirement for high-capacity loops or transport as part of any interim or permanent rules the Commission may adopt.

Sincerely,

/s/Michael E. Glover

cc: Michael Powell
Christopher Libertelli
Jon Cody
Sheryl Wilkerson
Kathleen Abernathy
Matthew Brill
Michael Copps
Jordan Goldstein
Jessica Rosenworcel
Kevin Martin
Daniel Gonzalez
Samuel Feder
Jonathan Adelstein
Barry Ohlson
Scott Bergmann
Michelle Carey
Thomas Navin
William Maher
Jeffrey Carlisle
Bryan Tramont

Business Types Served by
Sample CLECs Using Verizon Special Access

Category and Number of Circuits	Total	Category and Number of Circuits	Total
Accountants	104	Automotive - Auction	5
Advertising & Marketing	952	Automotive - Parts, Supplies, Service	1019
Aerospace Manufacturer	6	Automotive - Truck Sales, Service	43
Aerospace Research & Development	58	Aviation	66
Aerospace Technology	9	Aviation Services	113
Agricultural Products	8	Bail Bonds	3
Air Cargo & Package Express Services	7	Bank Equipment & Supplies	12
Air Conditioning Contractors	10	Bar Code Scanning Equipment & Supplies	2
Aircraft Flight Training Equipment	11	Barrels & Drums	7
Aircraft Manufacturers	56	Bearings Wholesale & Manufacturers	3
Aircraft Parts & Equipment	11	Beauty Salon Equipment & Supplies Retail	5
Airports	159	Beverages Wholesale & Manufacturers	4
Alarm Systems & Security Services	404	Biomedical Research	1
Alcohol & Drug Abuse Rehabilitation Services	18	Biotechnology	117
Ambulance Services	6	Boat Manufacturers	4
Antique Dealers	2	Book & Music Stores	180
Antique Reproductions Retailers	7	Books & Music Retailers	392
Apartment Complexes	3	Builders & Contractors	233
Appliance Service & Repair	1	Builders & Contractors - Commercial & Industrial	171
Appraisal Service	4	Builders & Contractors - Home Construction	65
Arcades & Amusements	32	Building Inspection & Pest Control Services	56
Architectural Services	32	Building Materials & Supplies Dealers	113
Armed Forces	782	Building Materials & Supplies Dealers - Fiberglass	8
Armed Forces - Air Force	2	Building Remodeling & Repair Contractors	9
Armed Forces - Air Force Base	263	Business & Professional Services	1230
Armed Forces - Army	194	Business Consultants & Advisors	2
Armed Forces - Coast Guard	3	Business Services - Distribution	245
Armed Forces - National Guard	4	Cable Manufacturers	3
Armed Forces - Navy	26	Call Centers & Answering Services	51
Art Collection	3	Cameras & Camera Supplies	13
Art Supplies Retailers	4	Camping & Backpacking Equipment & Supplies Dealers	1
Arts & Entertainment	130	Canners & Food Processors	10
Arts & Entertainment - Cinemas & Theatres	59	Cargo Container Manufacturers	12
Arts & Entertainment - Music	40	Catalog Shopping	6
Associations and Interest Groups	725	Catering	4
Auctioneers	23	CDs Tapes & Records Retail	2
Audiovisual Equipment Manufacturers	9	Cell Phone Equipment & Supplies	51
Audiovisual/Computer Rental & Leasing	6	Cement & Sand & Gravel Manufacturers	22
Autioneers	3	Certified & Registered Massage Therapists	2
Auto Clubs	2	Charitable & Nonprofit Organizations	1
Auto Dealers	1796	Chauffeured Services	18
Auto Manufacturers	131	Chemical Manufacturers	362
Auto Rentals	844	Chemicals Manufacturers	133
Automated Teller Machines	2		
Automation Consultants	2		
Automation Equipment & Systems Dealers	15		

Business Types Served by
Sample CLECs Using Verizon Special Access

Category and Number of Circuits	Total	Category and Number of Circuits	Total
Child Care	29	Concrete Contractors	4
Chimney Cleaning Services	3	Conference Call Services	14
Churches & Religious Organizations	329	Conference Facilities & Convention Centers	11
Civil Engineering Firm	8	Construction & Contractors - Doors & Windows	6
Civil Engineers	24	Construction & Contractors - Floors & Flooring	33
Cleaning Services	9	Construction & Contractors - General	
Clinical Services - Social & Human Services	12	Contractors	46
Clothing & Accessories (Designer) Retailers	28	Construction & Contractors - Roofing	3
Clothing & Accessories Manufacturers	182	Construction Engineers	5
Clothing & Accessories Retailers	736	Construction Equipment & Supplies	15
Cocoa Processors	1	Construction Equipment & Vehicle Rental	3
Cold Storage Warehouses	4	Construction Management Services	114
Collection Services	8	Consulting Services - General	1195
Communications - Video Conferencing	21	Consumer Goods Manufacturers	776
Commodity & Merchandise Warehouses	31	Consumer Goods Retailers	136
Common & Face Brick Dealers	2	Consumer Groups	5
Communications	1469	Contractors' Equipment & Supplies Dealers	20
Communications - Broadcasting	201	Convenience Stores	83
Communications - Cable	280	Conveyor Belting & Belting Supplies Dealers	3
Communications - Cable & Satellite	96	Copying, Printing & Graphics Services	610
Communications - Cellular	105	Corporate Housing	6
Communications - Internet Hosting	34	Corrugated & Fiber Boxes Retail	51
Communications - ISP	18	Cosmetics	116
Communications - Major Media	53	Cosmetics Retailers	31
Communications - Radio	70	Courier Services	12
Communications - Satellite & Cable	3	Crafts Stores	23
Communications - Telecom	5538	Credit & Debt Counseling Services	25
Communications - Television	163	Credit Collection & Reporting Agency	109
Communications - Verizon	1815	Cryogenics Equipment & Supplies	2
Communications - Wireless	2307	Currency Exchange Services	5
Communications & Public Relations	9	Customs Brokers & Consultants	31
Communications & Public Relations		Data Communications Equipment & Systems	13
Consultants	11	Dating & Introduction Services	1
Communications Equipment & Supplies	3	Defense Contractors	591
Computer & Equipment Dealers	18	Department Store	47
Computer Networking Installation	4	Department Stores	1800
Computer Peripherals - Printers, Laser Printers	9	Design and Engineering	48
Computer Supplies Parts & Accessories	13	Discount Variety Stores	90
Computer Systems Consultants & Designers	272	Document Management Services	138
Computer Testing Services	13	Dog & Horse Racing	16
Computers	891	Door & Window Dealers	8
Computers - Equipment & Supplies	70	Drug Stores & Pharmacies	887
Computers - Equipment Repair & Maintenance	156	Dry Cleaners	22
Computers & Equipment Repair	9	Education - Admin, Boards, Associations	123
Computing Solutions	4	Education - Colleges & Universities	1958
Concrete & Concrete Products Dealers	16	Education - Commercial Services	178

Business Types Served by
Sample CLECs Using Verizon Special Access

Category and Number of Circuits	Total	Category and Number of Circuits	Total
Education - K-12 Schools	686	Financial - Loan Service	73
Education - Professional Training/Devel	325	Financial - Loan Services	307
Electric Contractors	34	Financial - Mortgage Companies	1846
Electric Equipment & Supplies Dealers	71	Financial - Mutual Services	109
Electric Motor Dealers	30	Financial - Research Services	10
Electrolysis Treatments, Lasers	2	Finger Printing Services & Equipment	11
Electronic Equipment	5	Fire Alarms, Extinguishers & Sprinklers	28
Electronic Equipment & Supplies Retail	20	Fire Departments	8
Electronic Instruments Retail	112	Fire Fighters Associations	3
Electronic Research Design & Development	2	Fireproofing & Firestopping Materials & Supplies	2
Electronic Testing Equipment Dealers	27	Fish & Wildlife	3
Electronics & Appliance Manufacturers	43	Flavoring Extracts	14
Electronics & Appliance Parts & Supplies	41	Florists	46
Electronics & Appliances Manufacturers	203	Flour Mill	1
Electronics and Appliance Retailers	773	Food & Beverage Producers and Distributors	1515
Electronics Manufacturers	906	Food & Beverage Providers and Distributors	44
Electronics Wholesale Distributor	35	Food & Beverage Retailers	75
Elevator Equipment & Services	63	Food Preservation Equipment & Supplies	12
Employment Agencies	803	Food Processing Equipment & Supplies	11
Employment Agencies - Temp Staffing	113	Footwear Stores	20
Engineers	5	Forklift & Industrial Truck Dealers	4
Entertainment	154	Fragrance & Cosmetics Stores	3
Entertainment - Movie Studio	28	Funeral/Memorial Services	49
Envelopes Manufacturers & Wholesalers	6	Furniture	47
Environmental & Ecological Consultants	66	Furniture Stores	195
Environmental Association	22	Garage Doors & Openers	9
Environmental Engineers	26	Gas Stations	14
Environmental Services	26	General Merchandise Wholesale	36
Equipment Manufacturers	2	Genetic Research	1
Executive Suites	68	Genetics Research	16
Fabrics Stores	14	Geographic Information Services	13
Family & General Practice Physicians & Surgeons	11	Gift/Houseware Retailers	213
Fast Food Stores	15	Glass Wholesale & Manufacturers	22
Fasteners Wholesale & Manufacturers	8	Global Marketing, Communications, & Entertainment	12
Feed Fertilizer & Power Equipment	1	Global Positioning System	5
Fiber Optic Equipment Systems & Supplies	6	Government	24
Fiberglass & Materials	5	Government - Accounting	5
Financial - Advisor Services	34	Government - Civil Defense - Power Authority	35
Financial - Advisory Services	930	Government - Correctional Facility	90
Financial - Banks	12125	Government - Courthouse	56
Financial - Credit Card Companies	307	Government - Courts	115
Financial - Credit Unions	462	Government - Customs	3
Financial - Electronic Payment Svcs	145	Government - Embassy/Consulate	89
Financial - General Services	5485	Government - FBI	121
Financial - Investment Services	5906		

Business Types Served by
Sample CLECs Using Verizon Special Access

Category and Number of Circuits	Total	Category and Number of Circuits	Total
Government - Federal	3585	Gypsum & Gypsum Products	31
Government - Federal - Aviation	103	Hair Dressers	5
Government - Federal - Communications	48	Hair Restoration	2
Government - Federal - Courts	13	Hardware Stores	31
Government - Federal - Defense	564	Health & Beauty Products Manufacturers	53
Government - Federal - Defense - Imagery & Mapping	1	Health & Diet Foods Stores	44
Government - Federal - Food & Drug Admin	3	Health & Human Services - Leukemia	3
Government - Federal - Geological Surveys	8	Health Agencies	2
Government - Federal - Health & Human Services	127	Health Clubs & Gyms	11
Government - Federal - House of Representatives	28	Health Maintenance Organizations	57
Government - Federal - Housing & Urban Development	3	Healthcare	1355
Government - Federal - Info Systems	35	Healthcare - Clinics & Medical Centers	457
Government - Federal - Labor Relations	3	Healthcare - Dental	133
Government - Federal - Postal Services	13	Healthcare - General	3466
Government - Federal - Senate	16	Healthcare - Home (Nursing, Convalescent, Rehab)	40
Government - Federal - Treasury	36	Healthcare - Homes (Nursing, Convalescent, Rehab)	473
Government - Foreign	13	Healthcare - Hospitals	1500
Government - Foreign - Consulate	2	Healthcare - Physicians & Surgeons	6
Government - Foreign - Embassy	13	Healthcare - Radiology	56
Government - General Services Administration	93	Healthcare - Research, Labs	356
Government - Immigration & Customs	9	Healthcare - Vision	85
Government - Local	464	Heating & Refrigeration Equipment Manufacturers	109
Government - Local - Law Enforcement	42	Heating & Ventilating Contractors	24
Government - Local - Taxes & Finance	16	Heavy Equipment Manufacturers	18
Government - Local - Transportation	138	Home Décor Retailers	161
Government - National Parks & Conservation Land	7	Home Improvement Retailers	209
Government - Naval Shipyard	6	Home Improvement Services	1
Government - Police/Sherriff	23	Home Improvement Stores	537
Government - Printing	16	Home Improvement, Repair, Lawns Services	114
Government - State	706	Home Products - Siding	19
Government - State - Lottery	31	Hospice	12
Government - State - Sentate	48	Hospital Consultants & Management	1
Government - State - State Senate	66	Hospital Equipment & Supplies Retail	87
Government - Telecommunications	12	Hospitality	33
Government - Training	3	Hospitality Services	17
Government - US Congress Representatives	1	Hotel & Motel Equipment & Supplies	4
Government - Weather Service	17	Hotel Reservations Service Provider	7
Government Contractors - Computer Networks	3	Hotel Services	2
Government Contractors - Computer Systems	4	Hotels & Lodging	3857
Government Insurance Carriers	1	Household Linens & Furnishing Retailers	119
Greenhouses and Nurseries	6	Housing Authority	3
Grocery Stores & Supermarkets	2964	Human Resource Business Services	180
		Imaging Equipment Manufacturers	17

Business Types Served by
Sample CLECs Using Verizon Special Access

Category and Number of Circuits	Total	Category and Number of Circuits	Total
Incinerators Parts & Services	6	Lighting Fixtures Retailers	47
Industrial Equipment & Supplies	33	Linen Supply Services & Uniforms Retail	26
Industrial Equipment & Supplies Dealers	60	Lithographers	68
Industrial Equipment Rental & Leasing	3	Lumber	41
Industrial Parks Management	55	Mail Order & Catalog Sales	4
Industry - Aerospace	81	Malls & Shopping Centers	91
Industry - Metals	47	Management Consulting	478
Industry - Mining/Natural Resources	6	Manufacturers - General	1394
Industry - Paper	255	Manufacturers' Agents & Representatives	28
Industry - Power, Fuel, Water, Energy	1736	Materials & Packaging Manufacturers	341
Industry - Trade Association	146	Mechanical Contracting	13
Information Services	454	Mechanical Contractors & Engineers	1
Information Technology & Automation	4	Mechanical Equipment & Supplies	4
Ink Manufacturers' Materials	8	Media & Communications - Sales Presentations	3
Instruments & Equipment Manufacturers	111	Medical	4
Insurance	7444	Medical - Blood Bank	5
Insurance - Claims Processing Service & Adjusters	2	Medical & Dental X-Ray Laboratories	3
Insurance - Health Care Services	139	Medical Advisors/Consultants	4
Insurance - Life Insurance	17	Medical Analysis	3
Insurance - Title Insurance	98	Medical Answering Services	4
Insurance - Workers' Compensation Services	16	Medical Association	1
Interest Groups and Associations	12	Medical Billing & Collections Services	13
Interior Design	4	Medical Centers - Blood Center	6
Internet Services	1037	Medical Consulting	31
Investigation Services	16	Medical Device Manufacturers	19
IT Consulting & Business Services	1919	Medical Equipment	2
Jewelry Importers	3	Medical Exam Board	1
Jewelry Stores	104	Medical Information Technology	16
Journalism/News Service	145	Medical Laboratory	8
Journalism/News Services	27	Medical Laboratory - Radiology	1
Kitchen & Bath Distributor	27	Medical Products and Services	356
Labor Relations	1	Medical Research	39
Labor Unions	21	Medical Services	81
Laboratories	501	Medical Specialties	46
Laboratory Equipment & Supplies	1	Medical Specialties - Behavioral Health	18
Landscape Designers & Consultants	28	Medical Specialties - Cancer Foundation	1
Landscape Equipment & Supplies Dealers	74	Medical Specialties - Cancer Treatment Centers	2
Landscaping	5	Medical Specialties - Cardiovascular	2
Laundry Service	7	Medical Specialties - Cardiovascular Health	16
Law Firms & Legal Services	1047	Medical Specialties - Cerebral Palsy	15
Lawn & Garden Equipment & Supplies	6	Medical Specialties - Counseling	1
Leather Goods Manufacturers	3	Medical Specialties - Endoscopy	1
Leather Goods Retailers	63	Medical Specialties - Eye Surgery Center	1
Libraries	126	Medical Specialties - Home Care	6
Lighting Fixtures Manufacturers	8	Medical Specialties - MRI	25
		Medical Specialties - Muscular Dystrophy	12

Business Types Served by
Sample CLECs Using Verizon Special Access

Category and Number of Circuits	Total	Category and Number of Circuits	Total
Medical Specialties - OB-GYN	6	Parking & Traffic Consultants	4
Medical Specialties - Optometry	2	Parks & Recreation	25
Medical Specialties - Orthopedics	38	Party Supplies Stores	29
Medical Specialties - Radiology	14	Payroll & Payment Services	233
Medical Specialties - Ultrasounds	28	Payroll Services	10
Medical Staffing Services	1	Perfumes & Colognes Raw Materials & Supplies	4
Medical Supplies	5	Pest Control Services	63
Medical Transcription	4	Pharmaceuticals	1651
Merchandising	5	Phone Equipment & Systems Dealers	1
Merchandising Services & Systems	9	Photographic Equipment & Supplies	28
Metal Products	53	Photographic Equipment & Supplies Retail	4
Metal Stamping Equipment & Supplies	8	Photography Stores	5
Microfilming & Imaging Service		Photography Studios & Picture Libraries	3
Equipment/Supplies	8	Physical Therapy	1
Miscellaneous	53403	Physical Therapy Equipment and Supplies	7
Mobile Offices & Commercial Units	5	Pipe Fabrication	1
Modeling Agency	1	Plastic Products	92
Modular & Mobile Home & Buildings Dealers	3	Plastic Raw Materials	1
Money Orders & Transfer Services	5	Plumbing & Heating Supplies	128
Mortgages	205	Plumbing Services	3
Motion Picture Distributors	20	Plumbing Supplies	28
Moving & Storage	103	Pneumatic Equipment & Suppliers Dealers	10
Museums	72	Pneumatic Tools & Equipment	6
Music Publishing/Supply	27	Polyethylene Materials & Products	23
Musical Instrument - Rental and Sales	34	Postal Services	2
Newspaper Publishers	381	Product Packaging Labeling & Shipping	34
Non-Profit Organizations	334	Production Studio	17
NULL NAME	61222	Property Management	4
Office Furniture & Equipment Dealers	44	Public Housing	1
Office Machinery & Supplies	2	Publishers	779
Office Management Services	71	Radio Phone Equipment & Systems	24
Office Space and Support Services	94	Real Estate - Agencies	1235
Office Supplies Stores	730	Real Estate - Commercial & Industrial	159
Office Supplies Wholesale & Manufacturers	10	Real Estate - Commerical & Industrial	21
Office Supply Stores	27	Real Estate - Corporate Housing	17
Online Services	66	Real Estate - Developers & Subdividers	89
Organ Donation & Tissue Banks	6	Recreational Vehicles	6
Outdoor Advertising & Billboards	2	Recruiting Services	1
Outsourcing - Business Management	117	Recycling/Conservation Services	24
Packaging	7	Rentals - Furniture	5
Packaging & Shipping Services	710	Rentals - General	99
Paint & Paint Products	2	Rentals and Sales - Heavy Equipment	48
Paint Manufacturers	20	Research	358
Painting & Paint Supplies	7	Resorts	7
Paper Products	1	Restaurant Management & Consultants	2
Parking	11		

Business Types Served by
Sample CLECs Using Verizon Special Access

Category and Number of Circuits	Total	Category and Number of Circuits	Total
Restaurant Services	2	Sports - Clubs/Facilities	24
Restaurants	371	Sports - Equestrian	1
Retail - Pet Supplies	1	Sports - Football	15
Retailers - General	3	Sports - Golf/Country Clubs	43
Retirement Communities & Homes	49	Sports - Hockey	3
Road & Highway Construction Machinery & Equipment	8	Sports - Soccer	3
Robotics	2	Sports - Yacht Clubs	4
Sales Training	2	Sports & Recreation	15
Salons & Spas	7	Sports & Recreation - Off-Track Betting	13
Salvage Services	7	Sports & Recreation - Paint Ball	2
Sand & Gravel Dealers & Recycling Centers	18	Sports & Recreation - Youth & Family Centers	15
Saw Sales Sharpening & Repair	3	Steam Boiler	5
Science	46	Steamship Companies	4
Science - Forensics	2	Steel Manufacturers	77
Science - Health	8	Stock Exchanges	89
Science - Research	35	Swimming Pools Manufacturers & Installation	2
Science & Technology	3	Systems & Integration Engineers	1
Science and Engineering	279	Tax Return Preparation	147
Scientific Instruments & Supplies Dealers	87	Taxi Cab Services	2
Scooters & Powered Chairs	7	Technology - Computer Networks	28
Semiconductors	27	Technology - Data	265
Sewing Machines	1	Technology - Engineering	187
Shipbuilding	13	Technology - General	856
Sign Dealers, Display Designers & Producers	8	Technology - Network	993
Social & Human Services Organization	108	Technology - R&D	142
Social & Human Services Organizations	11	Technology - Software	1112
Social Clubs	2	Technology & Engineering	1142
Social Groups	25	Technology Research and Development	840
Soda Fountain Equipment & Supplies	10	Telecommunications Management	1
Software & CD ROM Sales & Services	6	Telecommunications Wiring & Cabling	13
Sound Equipment & Systems Sales Rental & Leasing	3	Telemarketing	12
Space & Navigation	5	Terminal & Container Services	5
Space Communications	5	Testing Equipment & Supplies Wholesale & Manufacturers	4
Space Exploration & Defense	7	Textile & Fabric Manufacturers	97
Specialty Stores	162	Title Company	38
Spices Wholesale & Manufacturers	1	Title Insurance/Escrow Services	80
Sporting Goods Retailers	189	Tobacco & Tobacco Products	19
Sports	3	Tools	5
Sports - Athletic/Fitness Clubs	229	Tools Wholesale & Manufacturers	2
Sports - Auto Clubs	20	Tourist Attractions	9
Sports - Baseball	5	Toy Manufacturers	40
Sports - Basketball	32	Toy Stores	230
Sports - Beach Club	1	Traffic & Transportation Engineers	9
Sports - Boxing	3	Translators & Interpreters	2
		Transportation	261

Business Types Served by
Sample CLECs Using Verizon Special Access

Category and Number of Circuits	Total
Transportation - Airlines	546
Transportation - Bus	33
Transportation - Rail	248
Transportation - Shipping	79
Transportation - Trucking/Freight	766
Travel Agencies & Tourism	835
Vehicle Licensing Service	2
Veterans	3
Veterinary Services	43
Video Production Services	2
Wallpaper Wholesale & Manufacturers	12
Warehouses	30
Waste Management	156
Water Filtration & Purification Equipment	
Retail	18
Waterworks Equipment & Supplies	3
Wire & Wire Products	2
Wireless Phone Stores	71
Wood Products	21
Wrecking & Demolition Contractors	8
Youth Organizations Centers & Clubs	6
Grand Total	248670